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July 27, 2023

VIA EMAIL AND ECF

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Daniel Delgado, 22-cr-00389-KMK

Dear Honorable Judge Karas:

I write to request an adjournment for the sentencing in the above captioned matter, which is currently scheduled for Monday, July 31, 2023, at 10:00 a.m., for approximately 30 days.

I am requesting this adjournment in order to consider how very recent legal developments may impact Mr. Delgado's case. Specifically, just last month there were two decisions in which courts have held that 18 U.S.C. § 922(g)(1) violates the Second Amendment, as interpreted by *New York State Rifle & Pistol Ass'n, Inc., v. Bruen*, 142 S. Ct. 2111 (2022). See *Range v. Att'y Gen.*, 69 F. 4th 96 (3d Cir. June 6, 2023) (en banc); *United States v. Jessie Bullock*, 2023, WL 4232309 (S.D. Miss. June 28, 2023). Such a request would permit effective representation of Mr. Delgado.

I have discussed the instant request with Michael Maimin, the Assistant United States Attorney assigned to this case, and he has no objection to the requested adjournment. Therefore, Mr. Delgado respectfully requests that the Court adjourn sentencing to adjourn the sentencing for approximately 30 days.

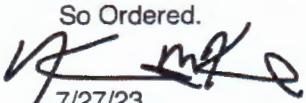
Granted. Sentence is adjourned to
9/ 13 /23, at 2:00

Respectfully submitted,



Elizabeth K. Quinn
Assistant Federal Defender
Attorney for Daniel Delgado

cc: Michael Maimin, A.U.S.A. (via email)



So Ordered.
7/27/23